

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Cleveland-Cliffs Inc.,

Case No.: 21-CV-1293 (PAM/DTS)

Plaintiff,

v.

Ravikant Ruia and  
Essar Global Fund Limited,

**DEFENDANT ESSAR GLOBAL  
FUND LIMITED'S MOTION TO  
DISMISS**

Defendants.

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To: Plaintiff Cleveland-Cliffs Inc. and Their Counsel of Record, Kristin K. Zinsmaster, Esq., Jones Day, 90 South Seventh Street, Suite 4950, Minneapolis, MN 55402; and Robert S. Faxon, Esq. and Kristin S.M. Morrison, Esq., Jones Day, North Point, 901 Lakeside Avenue, Cleveland, OH 44114.

Defendant Essar Global Fund Limited (“Defendant”) moves this Court to grant its Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12. Defendant’s Motion is brought based upon the pleadings, all of the files, records, and proceedings herein, and Defendant’s Memorandum of Law served and filed pursuant to the applicable rules of practice and this Court’s briefing schedule.

Dated: August 26, 2021

**WINTHROP & WEINSTINE, P.A.**

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